







| Risk Factors | LOWER RISK | HIGHER RISK |
|--|---|---|
| <p style="text-align: center;">AML COMPLIANCE PROGRAM</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>Assess Risk</p> </div> <div style="text-align: center;"> <p>Plan Policies & Controls</p> </div> </div> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>Implement Safeguards</p> </div> <div style="text-align: center;"> <p>Monitor & Evaluate</p> </div> </div> <p style="text-align: center;">AML COMPLIANCE PROGRAM</p> | <p>Super Stop has a written risk assessment of the financial services it offers to its customers.</p> | <p>Super Stop did not perform a risk assessment.</p> |
| | <p>Super Stop has a written AML Program tailored to its risk assessment. The AML Program has been implemented and is reasonably designed to ensure BSA compliance.</p> | <p>Super Stop does not have an AML Program or has not implemented the AML Program.</p> |
| | <p>AML Program defines the duties of all Super Stop's personnel, including BSA compliance officer and personnel responsible for preparing BSA Reports and transactions.</p> | <p>AML Program does not define the duties of Super Stop's personnel.</p> |
| | <p>AML Program addresses specific risks at the agent level.</p> | <p>AML Program has not been modified to identify specific risks at agent level.</p> |
| | <p>AML Program covers all financial services offered by Super Stop.</p> | <p>AML Program in place does not address all financial services entity provides.</p> |
| | <p>An independent review has been conducted, and Super Stop has implemented the recommendations from the review.</p> | <p>An independent review has not been conducted, or Super Stop has not implemented the recommendations from the independent review.</p> |
| | <p>Super Stop has a documented BSA/AML training program, including dates and names of training provided to appropriate personnel.</p> | <p>Super Stop does not provide continuous BSA/AML training to appropriate personnel.</p> |
| | <p>The author of the compliance program, policies, procedures and training does not conduct the independent review for Super Stop.</p> | <p>The author of the compliance program, policies, procedures and training also conducts the independent review for Super Stop.</p> |
| <p style="text-align: center;">INTERNAL CONTROLS</p> | <p>Internal control procedures of Super Stop provide for separation of duties, including custody of assets and recordkeeping functions.</p> | <p>Super Stop does not have written procedures for the separation of duties.</p> |
| | <p>Different staff than those conducting the transactions perform transactional reviews and BSA report preparation.</p> | <p>The same staff conducting the financial transactions prepares, reviews, and files required BSA reports.</p> |

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| <p style="text-align: center;">INTERNAL CONTROLS</p> | Management documents oversight duties, including decisions made to file or not file BSA reports. | Super Stop does not document its oversight duties and decisions. |
| | Error recognition computer software is in place to prevent the completion of a customer transaction when invalid or illogical data is input. | Employees can override input fields with invalid or illogical data entries when completing customer transactions. |
| | Electronic data is secure. A Business Continuation Plan is in place to provide back-ups for all records. | Electronic data is not secure. No plans are in place for emergency data restoration. |
| | Super Stop has posted its fees for the public to see. | Super Stop has special rates for different types of transactions or special customers that are not available to the general public. |
| <p style="text-align: center;">BUSINESS PRACTICES</p>  <p style="text-align: center;">BUSINESS PRACTICES</p> | <p>Transactional limitations are in place. Transactions in excess of limitation will not process without management or BSA compliance officer approval.</p> | Transactional limits are not in place. For example, the use of multiple money orders to purchase product or service is typical. |
| | | Transactional limitations do not meet customer needs, yet affected customers continue to use Super Stop's services. |
| | | Transactional limitations enforced by 3 rd -party, but no provision at retail level to prevent multiple transactions that could circumvent the limitations. |
| | Minimal employee turnover. | Frequent employee turnover. |
| | Super Stop employees automated systems to assist in identifying potential money laundering and/or terrorist financing. | Super Stop relies solely on paper documents. |
| | | Super Stop relies solely on automated reporting systems. Frontline employees do not initiate suspicious activity reports. |
| | Entity has controls in place to prevent losses or potential money laundering. These may include making copies of checks, or other funds received from the customer, or creating detailed records of certain transactions. | New employees can conduct transactions of any amount before they receive BSA/AML training. |
| | Formal transaction system in place requiring the use of a bank or other formal system to perform transactions. | Hawalas and any other "informal" transaction system. |
| Super Stop obtains the majority of the currency needed from its bank. | Super Stop receives the currency needed to provide the financial service from sources other than its bank. | |

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| <p>BUSINESS PRACTICES</p>  | <p>Transactional dollar limitations are in place. Transactions in excess of limitation will not process.</p> | <p>No transaction limitations, or no system lock-out when processing transactions > established limit.</p> |
| | <p>An organized and complete recordkeeping system is utilized.</p> | <p>No organized recordkeeping system is used.</p> |
| | <p>Super Stop separates the financial and bookkeeping activities of Super Stop from their other business.</p> | <p>Super Stop does not separate the financial and bookkeeping activities of Super Stop from their other business.</p> |
| | <p>Management of Super Stop is aware of the BSA, sound business practices (such as cash flow management) and accounting controls and procedures.</p> | <p>Management of Super Stop is unaware of the BSA, sound business practices (such as cash flow management) and accounting controls and procedures.</p> |
| | <p>Super Stop uses bank checks to pay expenses.</p> | <p>Super Stop pays expenses of business with cash.</p> |
| | <p>Super Stop charges check cashing fees.</p> | <p>Super Stop does not charge fees for check cashing.</p> |
| <p>CUSTOMERS</p> | <p>Customer base is stable and has been for several years. For example, most of the customers are employees from a large employer located near Super Stop.</p> | <p>Customer base is volatile in terms of few repeat customers; transaction volume is unpredictable and subject to large swings between time periods. For example, customers are self-employed.</p> |
| | <p>Super Stop cashes individuals' checks, which require less currency to be kept on hand.</p> | <p>Super Stop provides check cashing services to businesses that require large amounts of currency.</p> |
| | <p>The value of individual transactions as well as total volume are within expected range for customer base.</p> | <p>The value of individual transactions as well as total volume are not within expected range for customer base.</p> |
| | <p>Customers transmit funds to countries that have strong money laundering oversight and controls.</p> | <p>Customers transmit funds to countries that have poor money laundering oversight and controls.</p> |
| <p>AGENT CONTRACTS</p> | <p>Super Stop has one Agent relationship.</p> | <p>Super Stop has more than one Agent relationship.</p> |
| | <p>Principal provides various services to Super Stop including periodic on-site visits from the Principal's IT staff to provide support for any IT issues. The Principal also provides BSA/AML training materials, as well as an instructor for the agent's BSA/AML employee training seminars.</p> | <p>Principal does not monitor the day-to-day activities of its agents, provide up-to-date BSA/AML training, or perform internal reviews of its agents.</p> |

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| <p data-bbox="32 357 365 483">GEOGRAPHIC LOCATION</p>  | <p data-bbox="389 367 1039 409">Super Stop is not located in a HIFCA or HIDTA area.</p> | <p data-bbox="1055 210 1591 567">Super Stop is located in a HIFCA and/or HIDTA area. Examiners should note that while the location of Super Stop is an important factor, it is not the only factor. Determinations to the risk level of a particular Super Stop should involve an evaluation of all available information, including the nature and volume of Super Stop’s business and the control environment.</p> |
| | <p data-bbox="389 661 1039 703">Super Stop provides services to the local community.</p> | <p data-bbox="1055 577 1591 787">Super Stop derives significant business from customers outside the community, e.g. transaction volume is greater than the local community would seem to be able to support, or customers are from distances outside the local community.</p> |
| | <p data-bbox="389 829 1039 871">Super Stop is operating in a high-traffic retail area.</p> | <p data-bbox="1055 798 1591 903">Super Stop is located in owner’s personal residence or area that is not accessible to the public.</p> |
| | <p data-bbox="389 934 1039 1008">No or minimal SAR-MSB activity seen when the area’s location is researched on CBRS.</p> | <p data-bbox="1055 934 1591 1008">Significant SAR activity seen when the area’s location is researched on CBRS.</p> |
| | <p data-bbox="389 1060 1039 1134">For Super Stops with multiple locations, AML program and procedures address the risks at each location.</p> | <p data-bbox="1055 1039 1591 1144">Entity with multiple locations uses an AML program and procedures that do not consider the risks of all locations.</p> |
| <p data-bbox="89 1270 316 1470">PRODUCTS & SERVICES</p>  | <p data-bbox="389 1249 1039 1323">Customers generally transmit funds and/or purchase money orders with proceeds of payroll checks.</p> | <p data-bbox="1055 1165 1591 1407">Customers generally pay for funds transmittals and/or purchase money orders with currency. Customers generally pay for funds transmittals and/or purchase money orders with proceeds from business checks or other monetary instruments.</p> |
| | <p data-bbox="389 1459 1039 1533">Products and services offered are those needed by Super Stop’s customer base.</p> | <p data-bbox="1055 1438 1591 1543">One or more product or service that is needed by Super Stop’s customer base is not offered.</p> |
| | <p data-bbox="389 1711 1039 1785">Super Stop has a single Agent contract for each product or service.</p> | <p data-bbox="1055 1585 1591 1911">Super Stop has multiple Agent contracts for one or more of the products and services offered. Products purchased by customers are shipped overseas. Transmittal of funds sent to intermediary countries known to be conduits to prohibited countries. Transactions are not done face-to-face.</p> |